

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

(1) GREAT LAKES INSURANCE SE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-22-702-JD
	)	
(2) FREDY VALLE d/b/a VALLE	)	
TRUCKING;	)	
(3) SILVER STAR CONSTRUCTION	)	
COMPANY, INC.;	)	
(4) TYLON MACKEY;	)	
(5) ISRAEL JUAREZ;	)	
(6) ORD TRUCKING, INC.;	)	
(7) ZURICH AMERICAN INS. CO.	)	
	)	
Defendants.	)	
	)	
and	)	
	)	
(8) ZURICH AMERICAN INS. CO.,	)	
	)	
Third-Party Plaintiff,	)	
v.	)	
	)	
(9) BERKSHIRE HATHAWAY	)	
HOMESTATE INS. CO., and	)	
(10) PROGRESSIVE NORTHERN INS. CO.,	)	
	)	
Third-Party Defendants.	)	

**PLAINTIFF’S OBJECTIONS TO ZURICH AMERICAN INS. CO.’**  
**FINAL WITNESS LIST**

Plaintiff Great Lakes Insurance SE (“Plaintiff” or “Great Lakes”) hereby objects to Defendant Zurich American Insurance Company’s Final Exhibit List [Dkt. # 67] for the following reasons asserted herein. Further, as discovery is ongoing and may lead to additional objections to these exhibits or to the proposed scope of use, Plaintiff respectfully

reserves its right to add, modify or supplement its objections to any exhibits herein as part of the Pretrial Order or at trial, as may be appropriate and permitted by the Court.

No.	Description	Objection
1.	Accident Report for Underlying Accident (ZAIC_00001-ZAIC_000012)	No objection
2.	7/20/07 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000013)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
3.	10/4/07 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000014)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
4.	10/22/08 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000015)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
5.	5/7/09 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000016)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
6.	5/12/09 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company (ZAIC_000017)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
7.	7/9/10 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company (ZAIC_000018)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further

No.	Description	Objection
		objections reserved until trial.
8.	8/17/10 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000019)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
9.	9/14/10 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000020)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
10.	9/15/10 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000021)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
11.	10/5/10 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000022)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
12.	1/14/11 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000023)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
13.	1/14/11 Affidavit of No Operations, Fredy N. Valle Sr. (ZAIC_000024)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
14.	1/26/11 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000025)	lack of foundation or authentication-

No.	Description	Objection
		FRE901; irrelevant-FRE 401; further objections reserved until trial.
15.	4/12/11 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000026)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
16.	5/18/11 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000027)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
17.	5/19/11 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000028)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
18.	8/16/11 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000029)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
19.	11/7/12 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000030)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
20.	1/6/15 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000031)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.

No.	Description	Objection
21.	3/12/14 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000032)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
22.	2/20/15 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000033)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
23.	10/29/15 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000034)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
24.	10/19/15 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000035)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
25.	1/26/16 Oklahoma Corporation Commission Form E, Valle Trucking, Shelter General Insurance Company (ZAIC_000036)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
26.	2/22/16 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000037)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
27.	4/25/16 Oklahoma Corporation Commission Form K, Valle Trucking, Shelter General Insurance Company (ZAIC_000038)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.

No.	Description	Objection
28.	10/5/16 Oklahoma Corporation Commission Form E, Valle Trucking, Northland Insurance Company (ZAIC_000039)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
29.	6/1/17 Oklahoma Corporation Commission Form K, Valle Trucking, Northland Insurance Company (ZAIC_000040)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
30.	4/24/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 9/7/17 (ZAIC_000041)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
31.	11/20/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 11/15/18 (ZAIC_000042)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
32.	6/1/17 Oklahoma Corporation Commission Form K, Valle Trucking, Progressive Northern Insurance Company, coverage cancelled effective 1/11/19 (ZAIC_000043)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
33.	12/10/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 1/11/19 (ZAIC_000044)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further

No.	Description	Objection
		objections reserved until trial.
34.	12/18/18 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 12/18/18 (ZAIC_000045)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
35.	12/5/19 Oklahoma Corporation Commission Form E, Valle Trucking, Progressive Northern Insurance Company, coverage effective from 7/12/19 (ZAIC_000046)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
36.	3/15/13 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 3/7/13 (ZAIC_000047)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
37.	5/4/15 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 4/27/15 (ZAIC_000048)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
38.	4/30/15 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 4/30/15 (ZAIC_000049)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
39.	5/17/16 Oklahoma Corporation Commission Form E, Ordones Trucking, Shelter General Insurance Company, coverage effective from 5/17/16 (ZAIC_000050)	lack of foundation or authentication-FRE901; irrelevant-

No.	Description	Objection
		FRE 401; further objections reserved until trial.
40.	11/27/18 Oklahoma Corporation Commission Form E, Ord Trucking, Shelter General Insurance Company, coverage effective from 10/29/18 (ZAIC_000051)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
41.	9/2/20 Oklahoma Corporation Commission Form K, Ord Trucking, Shelter General Insurance Company, coverage cancelled effective 11/7/20 (ZAIC_000052)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
42.	10/20/20 Oklahoma Corporation Commission Form E, Ord Trucking, Progressive Northern Insurance Company, coverage effective from 11/7/20 (ZAIC_000053)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
43.	7/20/07 Oklahoma Corporation Commission Form E, Valle Trucking, United Financial Casualty Company, coverage effective from 7/19/07 (ZAIC_000054)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
44.	10/4/07 Oklahoma Corporation Commission Form K, Valle Trucking, United Financial Casualty Company, coverage cancelled effective 10/25/07 (ZAIC_000055)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
45.	10/22/08 Oklahoma Corporation Commission Form E, Fredy Valle, United Financial Casualty Company, coverage effective from 3/17/08 (ZAIC_000056)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.



No.	Description	Objection
46.	5/7/09 Oklahoma Corporation Commission Form K, Fredy Valle, United Financial Casualty Company, coverage cancelled effective 6/11/09 (ZAIC_000057)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
47.	5/12/09 Oklahoma Corporation Commission Form E, Fredy Valle, United Financial Casualty Company, coverage effective from 5/11/09 (ZAIC_000058)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
48.	7/8/10 Oklahoma Corporation Commission Form K, Fredy Valle, United Financial Casualty Company, coverage cancelled effective 8/12/10 (ZAIC_000059)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
49.	8/17/10 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 8/17/10 (ZAIC_000060)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial..
50.	9/13/10 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 10/15/10 (ZAIC_000061)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
51.	9/15/10 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 10/15/10 (ZAIC_000062)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
52.	10/5/10 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 11/5/10 (ZAIC_000063)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further

No.	Description	Objection
		objections reserved until trial.
53.	1/14/11 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 11/24/10 (ZAIC_000064)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial..
54.	12/30/10 Affidavit of No Operations, Fredy N. Valle Sr. (ZAIC_000065)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
55.	1/26/11 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 1/20/11 (ZAIC_000066)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
56.	4/12/11 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 5/16/11 (ZAIC_000067)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
57.	5/18/11 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 5/16/11 (ZAIC_000068)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
58.	5/19/11 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 5/16/11 (ZAIC_000069)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
59.	8/16/11 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 9/15/11 (ZAIC_000070)	lack of foundation or authentication-FRE901; irrelevant-

No.	Description	Objection
		FRE 401; further objections reserved until trial.
60.	11/17/12 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 11/6/12 (ZAIC_000071)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
61.	1/16/15 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 2/16/15 (ZAIC_000072)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
62.	3/12/14 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/18/14 (ZAIC_000073)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
63.	2/20/15 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/16/15 (ZAIC_000074)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
64.	10/29/15 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 10/26/15 (ZAIC_000075)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
65.	10/19/15 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 11/16/15 (ZAIC_000076)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
66.	1/26/16 Oklahoma Corporation Commission Form E, Fredy Valle, Shelter General Insurance Company, coverage effective from 2/26/16 (ZAIC_000077)	lack of foundation or authentication-FRE901; irrelevant-

No.	Description	Objection
		FRE 401; further objections reserved until trial.
67.	2/22/16 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 3/25/16 (ZAIC_000078)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
68.	4/25/16 Oklahoma Corporation Commission Form K, Fredy Valle, Shelter General Insurance Company, coverage cancelled effective 3/25/16 (ZAIC_000079)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
69.	10/5/16 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 8/25/16 (ZAIC_000080)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
70.	6/1/17 Oklahoma Corporation Commission Form K, Fredy Valle, Northland Insurance Company, coverage cancelled effective 7/5/17 (ZAIC_000081)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
71.	4/24/18 Oklahoma Corporation Commission Form E, Fredy Valle, Northland Insurance Company, coverage effective from 9/7/17 (ZAIC_000082)	lack of foundation or authentication-FRE901; irrelevant-FRE 401; further objections reserved until trial.
72.	11/20/18 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 11/15/18 (ZAIC_000083)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.

No.	Description	Objection
73.	12/7/18 Oklahoma Corporation Commission Form K, Fredy Valle, Progressive Northern Insurance Company, coverage cancelled effective 1/11/19 (ZAIC_000084)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
74.	12/10/18 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 1/11/19 (ZAIC_000085)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
75.	12/18/18 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 12/18/18 (ZAIC_000086)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
76.	12/5/19 Oklahoma Corporation Commission Form E, Fredy Valle, Progressive Northern Insurance Company, coverage effective from 7/12/19 (ZAIC_000087)	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
77.	Certified copy of ZAIC policy No. BAP 9809603-04 issued to Silver Star Construction, effective dates 04/01/19-04/01/20 (ZAIC_000088-ZAIC_000156)	No objection
78.	07/8/20 Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000157-ZAIC_000163)	No objection
79.	9/16/20 Answer of ORD Trucking filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000164-ZAIC_000170)	No objection

No.	Description	Objection
80.	1/22/21 Answer of Defendant Israel Juarez filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000171-ZAIC_000176)	No objection
81.	4/8/21 Plaintiff's First Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000177-ZAIC_000183)	No objection
82.	7/29/21 Transcript of Deposition of Israel Juarez (ZAIC_000184-ZAIC_000272)	No objection
83.	08/10/21 Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000273-ZAIC_000277)	No objection
84.	9/7/21 Combined Answer of Israel Juarez to Plaintiff's Petition, Plaintiff's First Amended Petition, and Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000278-ZAIC_000282)	No objection
85.	9/7/21 Defendant ORD Trucking's Answer to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000283-ZAIC_000291)	No objection
86.	9/27/21 Defendant Silver Star Construction Company's Answer to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000292-ZAIC_000304)	No objection
87.	5/2/22 Answer of Fredy N. Valle, Sr., d/b/a Valle Trucking to Plaintiff's Second Amended Petition filed in District Court of Payne County, OK CJ-20-233 (ZAIC_000305-ZAIC_000311)	No objection
88.	Defendant Silver Star Construction Company's Answers to Plaintiff's First Set of Interrogatories (ZAIC_000312-ZAIC_000334)	FRE 901; not produced and not sufficiently identified; further objections reserved upon proper identification
89.	Defendant Silver Star Construction Company's Responses to Plaintiff's First Request for Admission (ZAIC_000335-ZAIC_000341)	FRE 901; not produced and not sufficiently identified; further objections reserved upon proper identification

No.	Description	Objection
90.	Defendant Silver Star Construction Company's Answers to Plaintiff's First Requests for Production (ZAIC_000342-ZAIC_000372)	FRE 901; not produced and not sufficiently identified; further objections reserved upon proper identification
91.	Defendant Fredy N. Valle, Sr., d/b/a Valle Trucking Responses to Plaintiff's First Set of Discovery Request (ZAIC_000373-ZAIC_000391)	FRE 901; not produced and not sufficiently identified; further objections reserved upon proper identification
92.	7/15/22 Defendant Silver Star Construction Company's Amended Answer to Plaintiff's Second Amended Petition and Cross-Claims against Defendant Fredy N. Valle, Sr., d/b/a Valle Trucking (ZAIC_000392-ZAIC_000422)	No objection
93.	8/8/22 Answer of Fredy N. Valle, Sr., d/b/a Valle Trucking to Cross-Claim of Silver Star Construction (ZAIC_000423-ZAIC_000427)	No objection
94.	2/7/19 Hauling Service Agreement between Valle Trucking and Silver Star Construction Company (ZAIC_000428-ZAIC_000435) (duplicate of No. 106)	No objection
95.	2/8/19 Certificate of Liability Insurance, Berkshire Hathaway Homestate Ins. Co. to Fredy N. Valle, Sr. d/b/a Valle Trucking listing Silver Star Construction and its Subsidiaries as an additional insured (ZAIC_000436-ZAIC_000437)	No objection
96.	Uncertified copy of Great Lakes Insurance SE Policy No. GLG022472 issued to Valle Trucking, Inc. with effective dates of 2/11/19 to 2/11/20 (ZAIC_000438-ZAIC_000472)	No objection
97.	Certified copy of Great Lakes Insurance SE Policy No. GLG022472 issued to Valle Trucking, Inc. with effective dates of 2/11/19 to 2/11/20	No objection
98.	2/12/19 Certificate of Liability Insurance, Great Lakes Insurance (SE) to Valle Trucking, LLC listing Silver Star Construction Company and its Subsidiaries as Certificate Holder (ZAIC_000473)	No objection
99.	2/20/19 Certificate of Liability Insurance, Great Lakes Insurance (SE) to Valle Trucking, LLC listing Silver Star	No objection



No.	Description	Objection
	Construction Company and its Subsidiaries as Certificate Holder (ZAIC_000474)	
100.	9/5/19 Certificate of Liability Insurance, Progressive Northern Insurance Company to Fredy Valle, Valle Trucking listing Silver Star Construction and its Subsidiaries as Certificate Holder (ZAIC_000475)	No objection
101.	9/27/21 Letter from ZAIC to Fredy Valle demanding Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_000476-ZAIC_000478)	FRE 901; not produced and not sufficiently identified – FRE 901; further objections reserved upon proper identification
102.	11/15/21 Email from J. Chris Horton to <a href="mailto:Valletrucking51@yahoo.com">Valletrucking51@yahoo.com</a> re: attaching filings from underlying lawsuit and Demand from ZAIC to Valle Trucking (ZAIC_000479-ZAIC_480)	FRE 901; not produced and not sufficiently identified – FRE 901; further objections reserved upon proper identification
103.	4/8/21 Plaintiff's First Amended Petition filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000481-ZAIC_000487) (duplicate of No. 81)	No objection
104.	8/10/21 Plaintiff's Second Amended Petition filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000488-ZAIC_000494) (duplicate of No. 83)	No objection
105.	5/20/21 Certificate of Service by Mail filed in Payne County Oklahoma CJ-2020-233 (ZAIC_000495-ZAIC_000498)	lack of foundation or authentication- FRE901; irrelevant- FRE 401; further objections reserved until trial.
106.	11/15/21 Letter from ZAIC to Fredy Valle re: demand that Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_0000499-ZAIC_000501)	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved



No.	Description	Objection
		upon proper identification.
107.	2/7/19 Hauling Service Agreement between Valle Trucking and Silver Star Construction Company (ZAIC_000502-ZAIC_000509)	No objection
108.	5/17/22 Letter from ZAIC to Great Lakes Insurance SE demanding Great Lakes to defend and indemnify Silver Star Construction Company (ZAIC_000510-ZAIC_000512)	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
109.	5/17/22 Letter from ZAIC to Progressive Northern Insurance Company demanding Progressive to defend and indemnify Silver Star Construction Company (ZAIC_000513-ZAIC_000515)	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
110.	5/17/22 Letter from ZAIC to Berkshire Hathaway Homestate Ins. Co. demanding Berkshire Hathaway to defend and indemnify Silver Star Construction Company (ZAIC_000516-ZAIC_000518)	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
111.	5/25/22 Letter from Chris Horton to Jeffrey Curran, counsel for Fredy Valle d/b/a Valle Trucking, re: demand that Valle Trucking defend and indemnify Silver Star Construction Company (ZAIC_000519-ZAIC_000522)	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
112.	6/20/22 Letter from Berkshire Hathaway to ZAIC re: declining to accept tender (ZAIC_000523)-ZAIC_000524)	hearsay – FRE 801-802; lack of foundation or authentication – FRE

No.	Description	Objection
		901; further objections reserved upon proper identification.
113.	8/9/22 Letter from International Programs Group to Silver Star Construction Company, Chris Horton, and ZAIC re: Notice of Reservation of Rights (ZAIC_000525-ZAIC_000535)	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
114.	Correspondence from Progressive to Shelter Insurance dated 2/7/23	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
115.	Correspondence from Silver Star’s counsel to Progressive dated 9/19/22	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
116.	Correspondence from Progressive to Valle Trucking dated 2/7/23	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
117.	Correspondence from Progressive to Valle Trucking dated 2/8/23	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved

No.	Description	Objection
		upon proper identification.
118.	4/4/22 Great Lakes' Notice of Reservation of Rights to Valle Trucking	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
119.	5/25/22 Letter from J. Chris Horton to Jeffrey A. Curran re: demand for defense and indemnity of Silver Star in the litigation	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
120.	11/15/21 Email from Chris Horton to Valle Trucking's Mr. Monge re: asking him to provide the lawsuit and ZAIC's letter to his insurance company.	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
121.	2/8/19 Fax from Wanadaly Cruz, licensed insurance producer, to Great Lakes with Certificate of Insurance listing Berkshire as insurer	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
122.	9/4/19 Official Oklahoma Traffic Collision Report	No objection
123.	8/10/21 Summons to Silver Star with Plaintiff's Second Amended Petition	lack of foundation or authentication- FRE901; irrelevant- FRE 401; further

No.	Description	Objection
		objections reserved until trial.
124.	8/8/22 Notice of Reservation of Rights to Silver Star and Chris Horton from International Programs Group	FRE 901; not sufficiently identified – FRE 901; further objections reserved upon proper identification.
125.	<p>2/10/22 Email from Kenneth A. Shaw at Richey Ins to <a href="mailto:j.f.thill@jplush.com">j.f.thill@jplush.com</a> (John) re: Got this memo today. Please review.</p> <ul style="list-style-type: none"> <li>Includes forwarded 2/10/22 email from Casey Ryan at ZAIC to Richey Ins re; reporting claim for claimant Tylon Mackey for date of loss 9/4/2019, with attachments.</li> </ul>	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
126.	2/17/22 International Programs Group Letter to Valle Trucking re: reviewing the lawsuit and will advise regarding his request for defense and indemnity. Acknowledges Valle not yet been served, recommends he contact his attorney to protect his interests.	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
127.	10/4/21 Letter from ZAIC to Fredy Valle re: demanding defense and indemnity by Valle for Silver Star	hearsay – FRE 801-802; lack of foundation or authentication – FRE 901; further objections reserved upon proper identification.
128.	<p>2/14/22 Email from John Thill to Terri Singleton re: the application we have shows the contact person as Freddy Napoleon Valle Arana and the phone number 405-501-8005</p> <ul style="list-style-type: none"> <li>Includes 2/14/23 email from Terri Singleton to Mr. Shaw re: claim assigned to me for handling.</li> <li>Includes 2/11/22 email from <a href="mailto:j.f.thill@jplush.com">j.f.thill@jplush.com</a> to IPG Claims New Loss Notification,</li> </ul>	hearsay – FRE 801-802

No.	Description	Objection
129.	2/11/22 Email from Jessica Christopher to Samantha Porbeck, IPG Claims New Loss Notification, and Terri Singleton re: Set up as 77889 <ul style="list-style-type: none"> <li>Includes 2/11/22 email from Samantha Porbeck to IPG Claims New Loss Notification re: Please assign to Terri.</li> </ul>	hearsay – FRE 801-802.
130.	2/15/22 Email from Terri Singleton to <a href="mailto:newclaims@eandsclaims.com">newclaims@eandsclaims.com</a> re: ZAIC is requesting defense for the lawsuit due to the Hauling Service Agreement.	hearsay – FRE 801-802.
131.	7/29/21 Video Deposition of Israel Juarez	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
132.	2/15/22-2/16/22 Claim notes of Great Lakes	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
133.	All pleadings, motions, and orders filed in Payne County, Oklahoma District Court Case No. CJ-2020-233	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
134.	All discovery exchanged in Payne County, Oklahoma District Court Case No. CJ-2020-233	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.

No.	Description	Objection
135.	All discovery exchanged in the instant action	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
136.	Transcripts of all depositions taken in Payne County, Oklahoma District Court Case No. CJ-2020-233	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
137.	Transcripts of all depositions taken in the instant action	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
138.	Expert reports of all experts identified by any party to this action	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
139.	Expert reports of all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.

No.	Description	Objection
140.	Expert CVs of all experts identified by any party to this action	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
141.	Expert CVs of all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
142.	Expert invoices for time spent by all experts identified by any party to this action	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
143.	Expert invoices for all time spent by all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
144.	Expert prior testimony history for all experts identified by any party to this action	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.

No.	Description	Objection
145.	Expert prior testimony history for all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
146.	Expert publications for all experts identified by any party to this action	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
147.	Expert publications for all experts identified by any party in Payne County, Oklahoma District Court Case No. CJ-2020-233	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
148.	All documents exchanged by Progressive with its Initial Disclosures in this action unless otherwise objected to by ZAIC	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
149.	All documents exchanged by Great Lakes with its Initial Disclosures in this action unless otherwise objected to by ZAIC	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.



No.	Description	Objection
150.	All documents exchanged by ZAIC with its Initial Disclosures in this action unless otherwise objected to by ZAIC	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
151.	All documents produced in response to Subpoenas in this action	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
152.	All documents produced in response to Subpoenas in Payne County, Oklahoma District Court Case No. CJ-2020-233	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
153.	All documents exchanged in discovery in Payne County, Oklahoma District Court Case No. CJ-2020-233	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
154.	All documents exchanged in discovery in the instant action unless otherwise objected to by ZAIC	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.

No.	Description	Objection
155.	All deposition exhibits of depositions taken in this action unless otherwise objected to by ZAIC	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
156.	All deposition exhibits of depositions taken in Payne County, Oklahoma District Court Case No. CJ-2020-233 unless otherwise objected to by ZAIC	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
157.	All verified discovery responses from this action unless otherwise objected to by ZAIC	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
158.	All verified discovery responses in Payne County, Oklahoma District Court Case No. CJ-2020-233 unless otherwise objected to by ZAIC	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
159.	Plaintiff's Answers to ZAIC's Interrogatories	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.

No.	Description	Objection
160.	Progressive's Answers to ZAIC's Interrogatories	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
161.	Plaintiff's Responses to ZAIC's Requests for Production	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
162.	Progressive's Responses to ZAIC's Requests for Production	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
163.	Progressive's Responses to ZAIC's Requests for Admission	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
164.	Exhibits identified in Great Lakes' responses to ZAIC's discovery requests.	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.

No.	Description	Objection
165.	Exhibits identified in Progressive's responses to ZAIC's discovery requests.	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
166.	Exhibits identified by ongoing discovery in this action.	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
167.	Exhibits identified by ongoing discovery in the underlying action.	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
168.	All exhibits listed by Plaintiff in this case not otherwise objected to by ZAIC	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
169.	All exhibits listed by Progressive in this case not otherwise objected to by ZAIC	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.

No.	Description	Objection
170.	Affidavits or other documents needed for the identification and authentication of records.	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
171.	All materials considered or relied upon by experts in forming their opinions	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
172.	All exhibits necessary for rebuttal or impeachment	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.
173.	Any exhibits identified as discovery progresses in this matter	Limited admissibility-FRE 105;lack of foundation or authentication-FRE 901; further objections reserved until trial.

Respectfully submitted,

/s/ Emily E. Allan

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*Attorneys for Defendant*

**CERTIFICATE OF FILING**

I hereby certify that on October 3, 2023 I electronically filed the foregoing Objection to Final Exhibit List the Clerk of the U.S. District Court, Western District of Oklahoma, using the electronic case filing system of the Court.

By: /s/ Emily Allan